

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LOW TUCK KWONG, and)	
GRANITO LIMITED,)	
)	CIVIL DIVISION
Plaintiffs,)	
)	Case No. 2:15-cv-01028-CB
v.)	
)	
SUKAMATO SIA,)	
a.k.a. Sukarman Sukamto,)	
a.k.a. Ser Fuqiang,)	
a.k.a. Sia Hock Kian,)	
)	
Defendants,)	
)	
v.)	
)	
PNC Bank, N.A.,)	
)	
Party in Interest Holding Assets)	
Subject to Action.)	

MOTION FOR BRIEF ADJOURNMENT OF INJUNCTION HEARING

Plaintiffs Low Tuck Kwong ("Low") and Granito Limited ("Granito"), by and through undersigned counsel, respectfully request that the Court enter the attached proposed order briefly adjourning the injunction hearing presently scheduled for Friday, August 14, 2015, while maintaining in place the Temporary Restraining Order, and in support thereof state:

1. Immediately upon receipt of the August 7, 2015, Temporary Restraining Order at Docket No. 4 (the "TRO"), undersigned counsel provided notice of the TRO and the scheduled injunction hearing to counsel for PNC Bank, N.A.,

("PNC"), and began discussions with PNC in an effort to identify and locate defendant's accounts at issue.

2. Despite diligent and ongoing efforts by PNC and plaintiffs, the accounts at issue are not yet identified, though both PNC and plaintiffs are continuing their efforts.

3. Notifying defendant prior to identification and freezing of the defendant's account would moot the purpose of the TRO. A brief adjournment of the hearing will permit PNC and plaintiffs to complete their efforts to identify and freeze defendant's accounts. If the efforts succeed, notice of the injunction hearing will be attempted immediately upon defendant, while if the efforts do not succeed, the Court and the parties may avoid needless expenditure of judicial resources. Accordingly, a brief adjournment with the TRO remaining in place furthers the ends of justice and causes no party any prejudice.

4. Undersigned counsel consulted with counsel for PNC, who advised that PNC has no objection to the requested adjournment.

WHEREFORE, plaintiffs respectfully ask that the Court enter the attached proposed order adjourning the August 14th hearing for a brief period while maintaining the TRO in place.

Respectfully submitted,

THE LAW OFFICES OF
STEPHEN S. STALLINGS, ESQ.

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